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Submitted values are:

Your Name: Rev. (b) (6)

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Your Comments:

The following are my comments regarding EPA 's Portland Harbor Superfund Site Cleanup Plan. My name is (b) (6). I work with faith-based and other community groups on environmental and social justice issues and I am affiliated with First Unitarian Church in Portland. While I do not represent First Unitarian Church, my faith and my church community are the starting point for my response.

I want to commend the staff for the work they have done on this incredibly complicated and difficult challenge of how best to clean up the Portland Harbor site. It's a monumental job and you have made it reasonably understandable for most people.

First I will comment on the objective of returning the river itself to health. Alternative I is not aggressive enough in cleaning up the river bottom. It leaves too much of the area contaminated (over 80 percent) with only capping or natural recovery, mostly requiring monitoring for many years. There is no mention of the risk of seismic activity or significant flooding that would stir up the river bed. No one knows what a massive earthquake would actually do, but we know the risk of a deep subduction earthquake within the next 50 years is estimated to be about 50 percent. All that contaminated sediment could be stirred up and added to the mix of other toxins that would add significant danger to recovery efforts after a quake.

It seems to me that a level of cleanup more toward Alternative G would certainly be worth the investment. This would eliminate more of the worst contamination, reducing risk to aquatic life and the humans who may eat them.

It would also insure that less contamination would still be available to be spread around in the event of an earthquake or flood.

However much capping is used, it should be used only where there is certainty about its technical feasibility. We must also realize that capping has costs for the long-term with perpetual monitoring that adds to the cost of such measures. Somehow that monitoring, including funding it, must be built in to long term management schemes.

These comments support the recommendations regarding removal versus in-situ sequestration made by Willamette Riverkeeper and other organizations with a commitment to protecting the river.

Another dimension of cleanup that causes me concern is the proposed area for disposal of contaminated material dredged from the river. The danger of re-contaminating the river if the site is disturbed by flooding, or even an earthquake. There are too many uncertainties about river banks in the

future, and you need to assume a worst case scenario for any site used for disposal of contaminated material.

Another concern is for the humans who are impacted by the contamination in the river. In Portland, a large segment of the people who fish the river for food are those for whom fishing and eating fish are important cultural practices (many Native Americans) or those who have few resources and who depend on fishing as an inexpensive source of food. Neither group is able to use the Portland Harbor as a food source today. With a less aggressive cleanup process, there is a greater likelihood that cleanup will fail and in the end, people will still not be allowed to consume the fish.

I also agree with Willamette Riverkeeper that atmospheric transport must be included in the analysis of exposures. You need to know how much of a problem this could be so that you can do everything possible to eliminate unacceptable risks.

I was surprised that I could not find an analysis of the environmental justice dimensions of the existing situation or the impacts of the alternatives. I thought this was a required element of an EIS. It seems reasonable to assume that more complete cleanup of contaminants would improve their lives. Greater public access should be a goal of the entire process, and the public should have enough information about the process to know when to engage in the public decision processes at the state or local level to protect environmental justice interests. Agreements between impacted communities, polluters and government must be made to insure equity provisions are implemented during and following cleanup.

I look forward to seeing the results of these and all the comments you receive in the final project design. Thank you for listening to my comments.